December 23, 2013

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California Public Utilities Commission
Safety and Enforcement Division – TNC Licensing
505 Van Ness Avenue
San Francisco, CA 94102

Dear Licensing Officers,

We have enclosed for your review InstantCab's Plan on Avoiding Divide Between Able and Disabled Communities.

Sincerely,

Aarjav Trivedi
Chief Executive Officer, InstantCab

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on Regulations Relating to Passenger Carriers, Ridesharing, and New Online-Enabled Transportation Services	R. 12-12-011 (Filed December 20, 2012)

PLAN OF INSTANTCAB ON AVOIDING DIVIDE BETWEEN ABLE AND DISABLED COMMUNITIES

Dated: December 23, 2013

Submitted by:

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PLAN OF INSTANTCAB ON AVOIDING DIVIDE BETWEEN ABLE AND DISABLED COMMUNITIES

This document summarizes InstantCab's plans with respect to making its app more accessible to persons with disabilities and avoiding a divide between the able and disabled communities.

I. INSTANTCAB'S ACCESSIBILITY GOALS

InstantCab has created a transportation app that instantly matches people looking for a ride with drivers who are willing to provide a ride. This adds to people's transportation options in California, helps make transportation more efficient, and contributes to the overall California economy. For these reasons, InstantCab wants everyone in the able and disabled communities to be able to use TNC apps like InstantCab.

InstantCab intends to increase access in five ways: (1) allow people with disabilities to indicate access needs within the app; (2) move towards meeting accepted accessibility standards; (3) add more vehicles in the InstantCab system that can accommodate persons with disabilities; (4) better accommodate service animals; and (5) prevent discrimination by in-app rating mechanisms. These goals have varying methods and timelines of implementation.

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II. ALLOWING PERSONS WITH DISABILITIES TO INDICATE ACCESS NEEDS

InstantCab understands the importance of opening transportation apps to all communities, including the disabled community. To that end, InstantCab will work on allowing riders to indicate access needs within the app in both its Android and iPhone rider apps.

InstantCab has a friendly, accessible customer support team. Currently, if a rider needs an accessible vehicle, they can call our support line or send us an email. Someone from our customer support team will attempt to accommodate their needs. This guidance is provided on our FAQ page as well (http://help.instantcab.com/).

In our accessibility plan submitted to CPUC earlier this month, we indicated that we plan to allow riders to indicate access needs in our iPhone rider app and Android rider app within approximately 6 months. Accessibility features should adapt to different types of accessibility needs in order to prevent a divide between the able and disabled communities. Therefore, we will utilize our engineering resources to allow riders to indicate a need for wheelchair access and vehicles that are accessible in other ways. Riders would have the opportunity to communicate their personal access needs so we could best cater to them.

III. MEETING WCAG ACCESSIBILITY STANDARDS

To prevent a divide between the able and disabled communities, InstantCab will also move towards meeting the accessibility guidelines set out in Web Content Accessibility Guidelines 2.0A ("WCAG") by the World Wide Web Consortium. We

will take steps to ensure that our website and our Android and iPhone rider apps are accessible under the WCAG guidelines.

WCAG guidelines represent a consensus on the technological features that will allow people with disabilities to enjoy web content to the same extent as people without disabilities. The four primary WCAG accessibility standards are (1) perceptibility; (2) operability; (3) understandability; and (4) robustness.

InstantCab has already taken significant steps to ensuring that its content is *operable* and *understandable.* We have an interactive demo when riders first install the app that walks them through the different features of the app. The demo is sensitive to the time that different users may need to understand the content. The user must click or tap a specific place on the screen to move forward to the next step of the demo. We also have an FAQ page and other easily navigable pages on our website, as well as links on our website to the places where riders can download our app.

Once an InstantCab ride ends, the trip information is stored so that it continues to be accessible to riders afterwards. A record of all trips is saved in the rider's personal InstantCab trips page. At any time, the rider can log onto this page (from the app or on the web) to see their trip history, the cost of previous trips, the driver for previous trips, and the rating they gave the driver for previous trips. Drivers also have a similar page accessible through the app and the web where they can access records of their trip history. Therefore, InstantCab has already taken steps toward ensuring that the app is operable and understandable to riders and drivers.

We have also taken significant steps to ensure a *robust* app. We have an in-house professional testing team to discover bugs that would detract from user experience, including bugs that would uniquely affect users with disabilities. InstantCab also uses beta testing to discover and address bugs and get feedback from end users of the app. When InstantCab prepares for a release of a new version of the app, we beta test the new version with a core set of frequent drivers and riders for a few days. The engineering team resolves technical issues or bugs the users experience. In the future, we plan to ask beta testers what, if any, changes should be made to the app they are testing to enhance the user experience for users with disabilities. Our engineers also attend conferences and have a network that allows them learn about new technologies and use new technologies with InstantCab. These in-house testing procedures will help us create a robust website and app that prevents a divide between the able and disabled communities.

Finally, to make the apps more *perceptible* to people with disabilities, we plan to enable text alternatives in the app. An important step in this direction is to make the apps compatible with text-to-speech tools that are already available for iPhones and Android phones. This would allow a user with visual impairments to use all the functions of the app, thus bridging the divide between the able and disabled communities. As stated in our accessibility plan, the timeline for this is approximately 6 months.

In addition, our website (http://instantcab.com/) already supports built-in web browser tools that zoom in on the page so that the text appears larger. Within

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approximately the next 3 months, we plan to add more video and audio files to the website so that people with visual impairments can learn about how to use our app even if they cannot read the text on the website.

IV. ADDING MORE ACCESSIBLE VEHICLES

Adding more accessible vehicles to the InstantCab system can bridge the gap between the able and disabled communities by enabling the latter to reap the intended benefits of transportation apps like InstantCab –- a fast, inexpensive ride on-demand. To accomplish this, InstantCab will recruit more drivers who have accessible vehicles. InstantCab already mentions the need for and importance of accessible vehicles during driver recruitment, both in online ads and during in-person driver recruitment. InstantCab motivates drivers with accessible vehicles by letting them know that an accessible vehicle can result in more rides and more money for them.

Another thing that InstantCab plans to do in the future is create a monetary incentive for drivers with accessible vehicles to join InstantCab. For example, we may offer a higher share or one-time bonus to drivers who have accessible vehicles because we recognize their importance within the InstantCab system. We may also offer to reimburse drivers for all or a portion of the cost of making their vehicles accessible to persons with disabilities.

V. ACCOMMODATING SERVICE ANIMALS

Service animals enhance the daily independence of persons with disabilities, so it is important that TNCS like InstantCab can accommodate service animals to avoid a divide between the able and disabled communities.

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InstantCab has already posted its service animal policy on its FAQ webpage (http://help.instantcab.com/). Service animals are allowed in vehicles within the InstantCab system. Barring a medical condition of the driver or some other emergency, drivers must allow service animals in their vehicles to remain active within the InstantCab system.

InstantCab plans to allow riders, when making a request, to indicate within the app if they need a vehicle that can accommodate a service animal. In addition, InstantCab eventually hopes to have an automated way to dispatch only those drivers who can accept service animals to such requests. In other words, drivers who cannot accept service animals would not see ride requests where the passenger indicates they have a service animal. This functionality would improve the user experience for a rider with disabilities because it reduces the problem of a driver having to decline the ride *after* accepting the request due to medical reasons or some other valid reason. The rider would feel confident after making a request and indicating that they have a service animal that the driver would be able to accommodate the service animal and get them safely to their destination. As stated in our accessibility memo, the timeline for this method of dispatching requests is approximately 12 months.

VI. PREVENTING DISCRIMINATION BY IN-APP REVIEWS

One positive feature in TNC apps like InstantCab is that drivers and riders can rate each other and create a community that values excellent customer service. This has a positive impact for users with and without disabilities. We will take steps to monitor ratings and ensure that rating mechanisms are not used as a tool to

unlawfully discriminate against users of the service, on account of disability, end destination, or other protected characteristics. This applies to both riders rating drivers and to drivers rating riders.

InstantCab operates a rating system for drivers that spans from 5 (excellent driving and excellent customer service) to 1 (poor driving and poor customer service). When a rider rates a driver less than a 4, the InstantCab customer support team reaches out to the rider and asks them to share feedback about their experience. Based on the quality of feedback over an extended period of time, we may suspend a driver's account for poor ratings. However, if the rider makes discriminatory remarks related to a driver, the support staff would take measures to block that rider from using the service again.

Whenever a driver has a rider-related concern, they can report it by calling or emailing support. If a driver rates a rider with a low rating, we plan to require an explanation of the low rating to avoid discrimination. Our support staff will investigate the low rating by calling or emailing the rider and getting the rider's side of the story. Decisions to block a rider are based on more than just one bad rating. Moreover, we primarily block riders from using InstantCab only if they pose a safety threat or have engaged in credit card fraud. Our support team plans to audit driver ratings for riders on a periodic basis and contact riders to ensure that discrimination does not occur, on account of disability, end destination, or other characteristics.
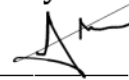
VII. CONCLUSION

Based on the foregoing plans, InstantCab will become more accessible to persons with disabilities in the near future and prevent a divide between the able and disabled communities. InstantCab plans to enable persons with disabilities to indicate access needs in the app, take steps toward meeting accessibility standards, add more vehicles to the InstantCab system that can accommodate persons with disabilities, better accommodate service animals, and prevent discrimination by in-app rating mechanisms. All of these steps, taken together, will bridge the divide between the able and disabled communities.

At InstantCab, we emphasize good customer service above all. Our customer support team is available to respond to phone calls and emails during business hours and during weeknights and weekends. A "call support" button is built into both the driver app and rider app, so the customer service team is just a tap away if our customers have any questions or concerns. We also have open office hours during which drivers and riders can stop by the office to ask questions. Our approachability and accessibility as a company will help avoid a divide from forming between the able and disabled communities.

Dated: December 23, 2013

Respectfully Submitted,

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